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January 14, 2020

District Judge Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: 1:19-cv-10463-RA  
Vinales v. Kemps LLC

Dear District Judge Abrams:


This office, with Reese LLP, represents the plaintiff. In accordance with your Honor's Individual Rules of Practice in Civil Cases, plaintiff requests an adjournment of the Initial Conference scheduled for Friday, January 24, 2020. There have been no previous requests for adjournment or extension of the conference date. No prior request was granted or denied. Defendant consents to and joins plaintiff in the present request. The reason for this request is because the parties are in negotiation for defendant to accept service of process. Plaintiff anticipates defendant will execute a waiver of service within the next two to three weeks. Plaintiff requests an adjournment of at least forty-five (45) days so that defendant can sign and return the waiver of service, evaluate the case and discuss it with the undersigned in advance of the date by which defendant's answer or response to the complaint is due. Thank you.

Respectfully submitted,

/s/Spencer Sheehan  
Spencer Sheehan

Application granted. The initial status conference scheduled for January 24, 2020 is adjourned to March 13, 2020 at 11:00 a.m. The parties' joint letter and proposed case management plan is due no later than March 6, 2020.

SO ORDERED.

  
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Ronnie Abrams, U.S.D.J.  
January 15, 2020

**MEMO ENDORSED**

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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 1/15/20.